



BellSouth Telecommunications, Inc.
333 Commerce Street, Suite 2101
Nashville, TN 37201-3300

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REGULATORY AUTH.

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August 27, 2001

EXECUTIVE SECRETARY

Guy M. Hicks
General Counsel

615 214 6301
Fax 615 214 7406

VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *BellSouth Telecommunications, Inc.'s Entry Into Long Distance
(InterLATA) Service in Tennessee Pursuant to Section 271 of
the Telecommunications Act of 1996*
Docket No. 97-00309

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth's Objections to First Data Requests of Consumer Advocate and Protection Division. Copies of the enclosed are being provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH:ch
Enclosure

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *BellSouth Telecommunications, Inc.'s Entry Into Long Distance (InterLATA Service) in Tennessee Pursuant to Section 271 of the Telecommunications Act of 1996*

Docket No. 97-00309

**BELLSOUTH'S OBJECTIONS TO FIRST DATA REQUESTS OF
CONSUMER ADVOCATE AND PROTECTION DIVISION**

BellSouth Telecommunications, Inc. ("BellSouth") hereby files its objections to the First Data Requests of Consumer Advocate and Protection Division to BellSouth.

GENERAL OBJECTIONS TO DATA REQUESTS

1. BellSouth objects to the Data Requests to the extent they seek to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such requests are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. BellSouth objects to each and every Data Requests to the extent that such Data Request calls for information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

3. BellSouth objects to each and every Data Request insofar as they are vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of

such Data Requests. Any answers provided by BellSouth in response to these Data Requests will be provided subject to, and without waiver of, the foregoing objection.

4. BellSouth objects to each and every Data Request insofar as the Data Requests are not reasonably calculated to lead to the discovery of admissible evidence and are not relevant to the subject matter of this action.

5. BellSouth objects to providing information to the extent that such information is already in the public record before the Authority.

6. BellSouth objects to each and every Data Request to the extent that the information requested constitutes "trade secrets" or that would require the disclosure of customer specific information. BellSouth also objects to the disclosure of confidential business information.

7. BellSouth objects to the Data Requests, instructions and definitions, insofar as they seek to impose obligations on BellSouth that exceed the requirements of the Tennessee Rules of Civil Procedure or Tennessee Law.

8. BellSouth objects to each and every Data Requests insofar as any of them is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. BellSouth is a large corporation with employees located in many different locations in Tennessee and in other states. In the course of its business, BellSouth creates countless documents that are not subject to Authority or FCC retention of records requirements. These documents are kept in numerous

locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been identified in response to these Data Requests. BellSouth will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the Data Requests purport to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

SPECIFIC OBJECTIONS TO DATA REQUESTS

Request No. 1: BellSouth objects to this Data Request on the grounds that it is not relevant to the subject matter of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence.

Request No. 2: BellSouth objects to this Data Request on the grounds that it is not relevant to the subject matter of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence.

Request No. 3: BellSouth objects to this Data Request on the grounds that it is not relevant to the subject matter of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence.

Request No. 4: BellSouth objects to this Data Request on the grounds that it is not relevant to the subject matter of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence.

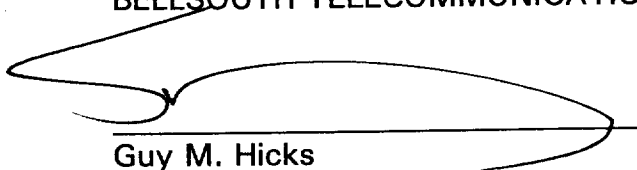
Request No. 12: BellSouth objects to this Data Request on the grounds that it is not relevant to the subject matter of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence.

Request No. 13: BellSouth objects to this Data Request on the grounds that it is not relevant to the subject matter of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence.

Request No. 14: BellSouth objects to this Data Request on the grounds that it is not relevant to the subject matter of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

A handwritten signature in black ink, appearing to read "Guy M. Hicks", is written over a horizontal line. The signature is stylized with a large loop at the end.

Guy M. Hicks
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Nashville, Tennessee 37201-3300
(615) 214-6301

Fred McCallum, Jr.
Lisa Foshee
675 W. Peachtree Street, Suite 4300
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CERTIFICATE OF SERVICE

I hereby certify that on August 27, 2001, a copy of the foregoing document was served on the parties of record, via hand delivery, facsimile, overnight or US Mail, addressed as follows:

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

H. LaDon Baltimore, Esquire
Farrar & Bates
211 Seventh Ave. N, # 320
Nashville, TN 37219-1823
for Qwest (fka LCI), Intermedia,
KMC Telecom III and V

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- ☐ Facsimile
- ☐ Overnight

Charles B. Welch, Esquire
Farris, Mathews, et al.
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Nashville, TN 37219
for Time Warner and New South

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- ☐ Overnight

Henry Walker, Esquire
Boult, Cummings, et al.
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for XO Communications, ICG
ACSI (e.spire), Brooks Fiber,
and SECCA

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- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

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- ☐ Facsimile
- ☐ Overnight

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Atlanta, GA 30367
for AT&T and TCG MidSouth

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- ☐ Facsimile
- ☐ Overnight

Cynthia Kinser, Esquire
Consumer Advocate Division
P. O. Box 20207
Nashville, TN 37202

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☐ Overnight

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☐ Overnight

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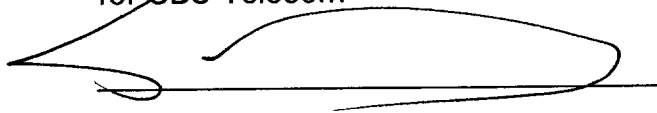
Andrew Klein, Esquire
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for KMC Telecom

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John McLaughlin, Jr.
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D. Billye Sanders, Esquire
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Nashville, TN 37219-8966
for SBC Telecom

A handwritten signature in black ink, appearing to be "D. Billye Sanders", written over a horizontal line.